

ORIGINAL

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Attorney for Defendant

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

FEB 02 2006

UNITED STATES OF AMERICA,

) CR. NO. 04-00401 HGat

o'clock and min. p. M
SUE BEITIA, CLERK

vs.

GEORGE KEAHI, JR.,
aka "Uncle Louie,"
aka "Opelu,"

(01)

) NOTICE OF MOTION;
) DEFENDANT MARY H. VANDERVELDE'S

BRIAN U'U,

(02)

) MOTION TO HIRE AT GOVERNMENT
) EXPENSE DR. BRENDA ANDRIEU, PH.D.
) AS EXPERT; MEMORANDUM OF LAW IN

ARNOLD C. ARRUIZA

(03)

) SUPPORT OF MOTION; EXHIBITS 1-3;
) DECLARATION OF JACK SCHWEIGERT, ESQ.;

MARY H. VANDERVELDE,

(04)

) CERTIFICATE OF SERVICE

CHRIS TOLBERT

(05)

)

Defendants.

)

) Non-Hearing Motion

)

)

) Sentencing: February 17, 2006 @ 10:00 a.m.

)

NOTICE OF MOTION

TO: Thomas Muehleck, Esq.
Assistant U.S. Attorney
300 Ala Moana Blvd., Box 50183, Room 6100
Honolulu, HI 96850
Attorney for U.S.A.

NOTICE IS HEREBY GIVEN pursuant to Crim.LR12.2 and LR7.4 that U.S.A. has 11 days after service of this motion to file any opposition to this non-hearing motion. Should U.S.A. not oppose this motion, it shall file a statement of no opposition or no position within the time provided above.

DATED: Honolulu, Hawaii; February 2, 2006.

Jack Schweigert, Esq.
Court-Appointed Attorney for Defendant
Mary H. Vandervelde

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

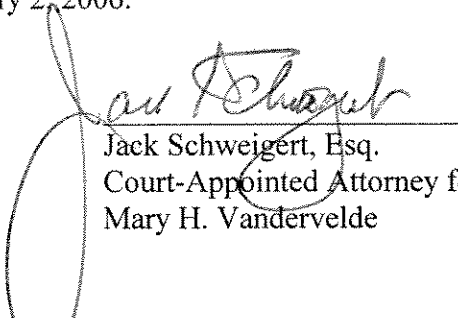
UNITED STATES OF AMERICA,)	CR. NO. 04-00401 HG
)	
vs.)	
)	
GEORGE KEAHI, JR.,	(01)	DEFENDANT MARY H. VANDERVELDE'S
aka "Uncle Louie,")	MOTION TO HIRE AT GOVERNMENT
aka "Opelu,")	EXPENSE DR. BRENDA ANDRIEU, PH.D.
BRIAN U'U,	(02)	AS EXPERT
ARNOLD C. ARRUIZA	(03))
MARY H. VANDERVELDE,	(04))
CHRIS TOLBERT	(05))
)	
Defendants.)	

DEFENDANT MARY H. VANDERVELDE'S MOTION TO HIRE
AT GOVERNMENT EXPENSE DR. BRENDA ANDRIEU, PH.D. AS EXPERT

COMES NOW DEFENDANT MARY H. VANDERVELDE, by and through counsel, and moves this Honorable court to hire at government expense Brenda Andrieu, Ph.D. to serve as expert and psychologically evaluate Defendant Vandervelde, prepare a report based on that evaluation, and provide testimony at Defendant's sentencing on February 17, 2006. By this motion, it is requested that the Court allow Dr. Andrieu to be paid \$150 per hour for her services, up to a maximum of \$1,500.

This motion is made pursuant to 18 U.S.C. § 3006A(e)(3) and is based on § 5K2.13 USSG, which allows for a downward departure based on mental impairment. This motion is supported by the attached declaration of Jack Schweigert, court-appointed counsel, Exhibits 1-3 attached hereto, and the record and file.

DATED: Honolulu, Hawaii; February 2, 2006.



Jack Schweigert, Esq.
Court-Appointed Attorney for Defendant
Mary H. Vandervelde